

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA  
DAVENPORT DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
LYDIA RUTH ANN VENTURA, )  
 )  
Defendant. )

Civil No. 3:19-cv-13

**COMPLAINT AND STIPULATION**

1. The United States brings this action to recover monies owed to it by the Defendant. This Court has jurisdiction pursuant to 28 U.S.C. § 1345.

2. The Defendant, Lydia Ruth Ann Ventura, resides in the Southern District of Iowa.

3. From October 2000 to March 2017, the Defendant received Supplemental Security Income (SSI) payments through the Social Security Administration, pursuant to 42 U.S.C. §§ 1381, *et seq.*

4. When the Defendant submitted a Redetermination in February 2016, she stated she was separated from her husband and he did not live with her. She had previously stated they were separated in 2000 and he had not lived with her since that time. In submitting the Redetermination, the Defendant expressly affirmed the facts contained therein were true and correct. As a result of the information submitted by the Defendant, she was approved for monthly SSI benefits.

5. Throughout this time, the Defendant did live with her husband.

6. Whether the Defendant lived with her husband or not was a material fact in determining

the Defendant's eligibility and continuing eligibility for and amount of benefits under SSI. As a result of the false information provided to SSI, the Defendant was approved and received a greater monthly benefit than the benefit to which she was entitled.

7. As a result of the false statements made by the Defendant in order to receive SSI, she received benefits to which she was not entitled in the amount of \$28,238.34.

### STIPULATION

8. The Defendant acknowledges the above allegations are true and correct and that as result of her false statements, she received \$28,238.34 in SSI benefits to which she was not entitled.

9. The Defendant agrees that she owes the United States the amount of \$28,238.34 and further agrees that the Court should enter judgment in favor of the United States for this amount.

*and had read to me Aug 2-1-19 L.R.V.*  
Defendant. I have read<sup>A</sup> all of this Complaint and Stipulation and have discussed it with my attorney. I fully understand the Complaint and Stipulation and accept and agree to it without reservation. I do this voluntarily and of my own free will. No promises have been made to me other than the promises in this Complaint and Stipulation. I have not been threatened in any way to get me to enter into this Complaint and Stipulation. I am satisfied with the services of my attorney with regard to this Complaint and Stipulation and other matters associated with this case. I am entering into this Complaint and Stipulation and will enter my plea of guilty under this Agreement because I committed the crime to which this Complaint and Stipulation references. I know that I may ask my attorney and the judge any questions about this Complaint and Stipulation, and about the right I am giving up, before signing this document.

2-1-19  
Date

*Lydia Ventura*  
LYDIA RUTH ANN VENTURA

Defendant's Attorney. I have read this Complaint and Stipulation and have discussed it in its entirety with my client. There is no Complaint and Stipulation other than the agreement set forth in this writing. My client fully understands this Complaint and Stipulation. I am satisfied my client is capable of entering into this Complaint and Stipulation, and does so voluntarily of Defendant's own free will, with full knowledge of Defendant's legal rights, and without any coercion or compulsion. I have had full access to the Government's discovery material, and I believe there is a factual basis for the Complaint and Stipulation. I concur with my client

entering into this Complaint and Stipulation and in entering a plea of guilty pursuant to the Complaint and Stipulation.


2-1-19  
Date

  
DIANE HELPHREY  
Federal Public Defender's Office  
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Davenport, IA 52801-1815  
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United States. The Government agrees to the terms of this Complaint and Stipulation.

Marc Krickbaum  
United States Attorney

2/4/19

By:   
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